

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**CASE NO. 23-80101(s)-CR-CANNON**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**DONALD J. TRUMP,  
WALTINE NAUTA, and  
CARLOS DE OLIVEIRA,**

Defendants.

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**GOVERNMENT’S CONSENT MOTION FOR ADDITIONAL PAGES**

On June 17 and 20, 2024, the defendants filed their first Notices pursuant to Section 5(a) of the Classified Information Procedures Act (“CIPA”), 18 U.S.C. App. 3. *See* ECF Nos. 625 (Trump) and 631 (Nauta and De Oliveira). The Notices each exceed 40 pages in length. The Government’s responsive motion—which will notice the Government’s objections pursuant to Sections 5(b) and 6(b) of CIPA and request a hearing pursuant to Section 6(a) of CIPA—is due on July 10, 2024 (*see* ECF No. 530), and it must contain substantive responses concerning the use, relevance, or admissibility of each piece of classified information the defendants have stated they intend to disclose. Accordingly, the Government seeks leave to file a combined notice and motion that is up to 55 pages in length. The Government intends to file a consolidated notice and motion addressing both notices (although in separate and distinct sections), because the legal principles section will apply to all defendants and because the defendants have noticed overlapping information. As set forth in the accompanying Certificate of Conference, counsel for all three defendants consent to this Motion.

For the foregoing reasons, the Court should grant the Government's Motion.

Respectfully submitted,

JACK SMITH  
Special Counsel

By: /s/ Jay I. Bratt  
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**CERTIFICATE OF CONFERENCE**

On July 3 and July 5, 2024, counsel for the Government and counsel for the defendants conferred via email concerning the relief the Government is seeking in this Motion. On July 5, 2024, counsel for defendant Trump advised Government counsel on behalf of themselves and the other defense attorneys that all three defendants consent to this Motion.

/s/ Jay I. Bratt  
Jay I. Bratt

**CERTIFICATE OF SERVICE**

I, Jay I. Bratt, certify that on July 5, 2024, I served the foregoing document on all parties via CM/ECF.

/s/ Jay I. Bratt  
Jay I. Bratt